

EXHIBIT “H”

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

SUNIL KUMAR, Ph.D., PRAVEEN) Case No.
SINHA, Ph.D.,) 2:22-cv-07550
) RGK-MAA
)
Plaintiffs,)
)
v.)
)
DR. JOLENE KOESTER, in her)
official capacity as)
Chancellor of California)
State University,)
)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF
SUNIL KUMAR, Ph.D.
Zoom Remote Location
August 9, 2023

REPORTED BY: BOBBIE HIBBLER, CSR NO. 12475

Sunil Kumar, PhD, 8/9/2023

A. No. None of the Hindu text talks about caste discrimination. But the definition adopted by CSU and CSU community associate it with Hindu with all the texts. So, that's why it affects my religious beliefs.

6 Q. So, your testimony is that you had to 12:39
7 change your religious beliefs because CSU is 12:39
8 barring discrimination based on caste? 12:39

9 A. It can. 12:39

10 Q. Not it can. My question is this, have 12:39
11 you changed your religious beliefs because CSU 12:39
12 passed a policy barring caste discrimination? 12:39

13	A.	So, there is no reason to change the	12:39
14		beliefs so far. But the situation may arrive and	12:39
15		I will have to change my beliefs. Unfortunately,	12:39
16		there is no yes or no answer to this. It's much	12:40
17		more nuanced.	12:40

18 Q. Did anyone at CSU tell you to change 12:40
19 your religious beliefs? 12:40

20 A. No. Not to my knowledge. 12:40

21 Q. Did anyone at CSU ask you to change your 12:40
22 religious beliefs? 12:40

23 A. So, a few colleagues in the discussion 12:40
24 did question this caste system which makes me 12:40
25 subject to ridicule and not talk about my 12:40